

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

MARIA ARENAS, individually,	*
	*
Plaintiff,	*
v.	*
JOHN CALHOUN, in his individual capacity,	*
	*
Defendant.	*

CIVIL ACTION FILE  
No. 5:16-cv-1203-XR

**DEFENDANT'S EXPERT DISCLOSURES**

COMES NOW Defendant John Calhoun, pursuant to Federal Rule of Civil Procedure 26(a)(2), and makes his expert disclosures in this case as follows:

**I. RULE 26(a)(2)(B) WITNESSES**

Defendant identifies Daniel B. Vasquez. Mr. Vasquez's opinions in this case are set forth in his expert report, prepared pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), as attached hereto. His curriculum vitae, cases, and fees are also attached hereto.

Defendant also identifies Dr. Carol A. Terry, M.D., who is the Chief Medical Examiner in the Gwinnett County Medical Examiner's Office. Dr. Terry's report, curriculum vitae, cases, and fees are forthcoming and will be supplemented within the next week. Dr. Terry will testify and opine on how long it takes for a person to die from a suicide by hanging, as well as whether any conclusion can be reached on how long Inmate Tavera had been deceased by the time the officers entered the cell, and any other medical issues surrounding Inmate Tavera's suicide.

## **II. RULE 26(a)(2)(C) WITNESSES**

Defendant identifies each of the following treating medical personnel, who may testify and opine on matters regarding their diagnosis and treatment of Richard Tavara: Steven Finderson, Phyllis Allen, Aleta Gardner, Roy Jefferson, Jolisa Simpson, Mary Lane Cooper, Dr. Oliga, LPN Faulk, RN Hower, Lashanda Amos, and any other medical personnel listed in Inmate Tavara's medical records. These individuals will provide opinions regarding Inmate Tavara's physical and mental health and the practices and policies that relate to the treatment of mentally ill inmates. These individuals' opinions are set forth in the medical records they created, which have been produced in this case.

Defendant also identifies correctional officers or officials with GDOC who have knowledge of GDOC's practices and policies regarding: (1) the treatment of mentally ill inmates, and (2) the procedures for entering an inmate's cell during a potential emergency.

Served this 13th day of October, 2017.

CHRISTOPHER M. CARR                    112505  
Attorney General

KATHLEEN M. PACIOUS                    558555  
Deputy Attorney General

ROGER CHALMERS                        118720  
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*/s/ Ellen Cusimano*  
ELLEN CUSIMANO                        844964  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I served **DEFFENDANT'S EXPERT DISCLOSURES** on Plaintiff's counsel of record by electronic mail and by first class U.S. Mail addressed to:

Jeff Edwards  
Scott Medlock  
David James  
The Edwards Law Firm  
The Haehnel Building  
1101 E. 11<sup>th</sup> Street  
Austin, TX 78702

This 13th day of October, 2017.

*/s/ Ellen Cusimano* \_\_\_\_\_  
ELLEN CUSIMANO 844964  
Assistant Attorney General  
*Pro Hac Vice*